



February 22, 2013

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**VIA ELECTRONIC COMMENT FILING SYSTEM (ECFS)**

Ms. Marlene H. Dortch  
Office of the Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW  
Suite TW-A325  
Washington, DC 20554

Re: EB Docket No. 06-36 - CPNI Certification and Accompanying Statement

Dear Ms. Dortch:

On behalf of ConNEXTions Telecom, please find the attached annual CPNI certification and accompanying statement which is being filed pursuant to Commission Rule 64.2009(e).

Should you have any questions or need further information, please contact me at (512) 343-2544.

Sincerely,

A handwritten signature in black ink, appearing to read "Jean Langkop".

Jean Langkop  
Authorized Representative of  
ConNEXTions Telecom

JL/cn

Attachments

cc: Mr. Steven Steele, ConNEXTions Telecom  
Ms. Sharon Hurley, ConNEXTions Telecom

**Annual 47 C.F.R. § 64.2009(e) CPNI Certification**

**EB Docket 06-36**

Annual 64.2009(e) CPNI Certification for 2013 covering the prior calendar year 2012

Date: February 22, 2013

Name of company covered by this certification: ConNEXTions Telecom

Form 499 Filer ID: 820628

Name of signatory: Steven Steele

Title of signatory: General Manager

I, Steven Steele, certify that I am an officer of the Company named above, and acting as an agent of the Company, that I have personal knowledge that the Company has established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules. *See* 47 C.F.R. § 64.2001 *et seq.*

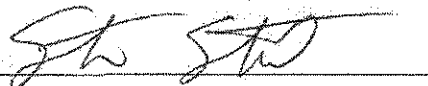
Attached to this certification is an accompanying statement explaining how the Company's procedures ensure that the Company is in compliance with the requirements set forth in section 64.2001 *et seq.* of the Commission's rules.

The Company has not taken any actions (proceedings instituted or petitions filed by a Company at either state commissions, the court system, or at the Commission against data brokers) against data brokers in the past year.

The Company has not received any customer complaints in the past year concerning the unauthorized release of CPNI.

The Company represents and warrants that the above certification is consistent with 47 C.F.R. § 1.17 which requires truthful and accurate statements to the Commission. The Company also acknowledges that false statements and misrepresentations to the Commission are punishable under Title 18 of the U.S. Code and may subject it to enforcement action.

Signed



Attachment: Accompanying Statement of Compliance explaining CPNI procedures

ConNEXTions Telecom  
Accompanying Statement of Compliance

ConNEXTions Telecom ("the Company") is in full compliance with the FCC rules on CPNI and its requirements for the safeguarding of such customer information. The Company's operating procedures ensure that it is in compliance with the FCC's CPNI Rules because disclosure of, or permitting access to, our customers' CPNI is not allowed without obtaining the requisite customer approval, except as required by law, or the exceptions set forth in 47 U.S.C. §222, and Subpart U of Title 47 of the Code of Federal Regulations; 47 C.F.R §64.2001 through §64.2011.

The Company has designated a Director for CPNI compliance who is responsible for communicating with the Company's attorney and/or consultants regarding CPNI responsibilities, requirements and restrictions; supervising the training of the Company employees who use or have access to CPNI; supervising the use, disclosure, distribution or access to the Company's CPNI by independent contractors and joint venture partners; maintaining records regarding the use of CPNI in marketing campaigns; and receiving, reviewing and resolving questions or issues regarding use, disclosure, distribution or provision of access to CPNI.

Appropriate safeguards on the disclosure of CPNI have been implemented in accordance with C.F. R. §64.2010. Customers are properly authenticated before disclosing CPNI on customer-initiated telephone calls or business office visits. Authentication through the use of passwords and back-up authentication questions in the event of lost or forgotten passwords have been implemented. Passwords and back-up authentication security questions are established in accordance with §64.2010(e). Call detail information is not discussed with a customer on a customer-initiated call unless the customer can provide a pre-established password, or the customer has sufficient details about the call(s) in question to address the customer service issue. If the customer is unable to provide a password or specific details of the call, call detail information can be shared only by (1) calling the customer back at the telephone number of record; (2) mailing the information to the address of record; or (3) the customer coming to the office with a valid photo I.D.

The Company has internal procedures in place to educate our employees about CPNI and the disclosure of CPNI. Employees with access to this information are aware of the FCC's rules and are prohibited from disclosing or permitting access to CPNI without the appropriate customer consent or as allowed by law and the FCC rules. The Company's Employee Handbook includes disciplinary actions related to the misuse of CPNI. Any employee that uses, discloses, or permits access to CPNI in

ConNEXTions Telecom  
CPNI Certification for 2013

violation of Federal regulations is subject to disciplinary action, and possible termination.

The Company complies with the FCC's rules regarding the notification of law enforcement and customers, in the event of a CPNI breach. The Company maintains a record for at least two years of any breaches discovered, notifications made to law enforcement (i.e., United States Secret Service and the Federal Bureau of investigation) and customers, and responses from law enforcement.

It is the Company's policy not to disclose or provide access to CPNI to Joint Venture partners of independent contractors for marketing purposes. Currently the Company has no Joint Venture partners; however, if that changes in the future and the Company decides to share customers' CPNI for marketing purposes, CPNI will be shared only of those customers who have given express consent (opt-in approval) to do so.

The Company does not presently use, sell, or otherwise release CPNI for marketing or other commercial purposes. If our customers' CPNI is to be used for sales and marketing campaigns in the future, the appropriate safeguards will be implemented in accordance with 47 C.F.R. §64.2009(c)(d) and (f).